

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SUN LIFE ASSURANCE COMPANY OF)
CANADA,)

Plaintiff,)

v.)

JANICE KUMM and DEANN KUMM,)
as co-personal representatives of the)
ESTATE OF GAYLORD KUMM; DEANN)
KUMM, individually; ESTATE OF)
GAYLORD KUMM; BEN KUMM,)
individually; GLEN R. KUMM,)
individually; and STARR KUMM n/k/a)
Starr Wallace, individually,)

Defendants/Third-Party Plaintiffs,)

v.)

GERALD BRYCE, JAMES GRENDALL,)
BRYAN REIL, and PARADIGM)
FINANCIAL SERVICES, LLC,)

Third-Party Defendants.)

CASE NO. 8:08-CV-290

**AMENDMENT TO STIPULATED
PROTECTIVE ORDER**

Plaintiff, Sun Life Assurance Company of Canada (“Plaintiff”), Defendants, Janice Kumm, DeAnn Kumm, Ben Kumm, Glen R. Kumm, and Starr Kumm (collectively “Defendants”), and Third-Party Defendants, Paradigm Financial Services, LLC, Gerald Bryce, James Grendell, and Bryan Reil (collectively, “Third-Party Defendants”), by and through their respective counsel, hereby stipulate and agree to the following amendment of the Court’s March 9, 2009 Stipulated Protective Order:

Paragraph 1 shall now read as follows:

“1. Plaintiff, Defendants, and Third-Party Defendants stipulate and agree that they have an obligation to ensure the confidentiality of documents filed as Restricted Documents under the E-Government Act, all underwriting materials and agreements with non-parties whether or not related to the present matter which may be produced in this case in response to any party’s discovery requests or to testifying or non-testifying experts. In addition, Plaintiff, Defendants, and Third-Party Defendants stipulate and agree that, in the case of any documents produced pursuant to a subpoena, the third-party providing the documents or any party to this case has the right to designate documents as confidential if they contain confidential customer records, client information, business records, underwriting materials, and agreements with non-parties, whether or not related to the present case. Accordingly, the parties show the Court that good cause exists for the entry of a protective order.”

This amendment to the Court’s March 9, 2009 Stipulated Protective Order only modifies, and in no way displaces, the Court’s March 9, 2009 Order. This amendment shall be binding upon the parties, their attorneys, agents, employees, representatives, successors, and assigns from this date forward for documents first produced or disclosed from such date.

Dated this 31st day of March, 2009.

GERALD BRYCE, Third-Party Defendant,

s/ Albert M. Engles
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representatives of the ESTATE OF GAYLOR KUMM,
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and STARR KUMM, Defendants/Third-Party Plaintiffs,

s/ Kenneth Hartman_____

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JAMES GRENDELL and PARADIGM FINANCIAL
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IT IS SO ORDERED.

Dated this _____ day of _____, 2009

By the Court:

United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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